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**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

AMERICAN CIVIL LIBERTIES  
UNION FOUNDATION OF  
SOUTHERN CALIFORNIA,  
*Plaintiff,*

v.

UNITED STATES IMMIGRATION  
AND CUSTOMS ENFORCEMENT,  
*et al.,*

*Defendants.*

Case No. 2:22-CV-04760-SHK

**ERRATA TO JOINT STATUS  
REPORT RE DEFENDANT DHS-  
CRCL's PRODUCTION OF  
RECORDS PURSUANT TO  
COURT'S JULY 8, 2025 SUMMARY  
JUDGMENT ORDER (ECF NO. 87)  
– CORRECTED EXHIBIT 3  
(DECLARATION OF CATRINA M.  
PAVLIK-KEENAN)**

Honorable Shashi H. Kewalramani  
United States Magistrate Judge

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15 *Attorneys for Plaintiff*

1 The Parties jointly file this Errata to their Joint Status Report filed on May 23,  
2 2025 (ECF No. 122) in advance of the May 27, 2025 Status Conference in this case  
3 to address outstanding issues regarding the status of Defendant Department of  
4 Homeland Security's ("DHS") Office of Civil Rights and Civil Liberties' ("DHS-  
5 CRCL") production of documents in response to the Court's July 8, 2024 Order (ECF  
6 Docket No. 87) in this Freedom of Information Act ("FOIA") suit.

7 The Report included as Exhibit 3 the declaration of the Deputy Chief FOIA  
8 Officer of DHS' Privacy Office, Catrin Pavlik-Keenan. In the course of compiling  
9 the Report for filing, the electronic signature from that declaration was inadvertently  
10 removed. A correct version of that declaration with the signature is attached hereto  
11 as Exhibit 3.

12  
13 Respectfully submitted,

14  
15 Date: May 24, 2025

/s/ Laboni A. Hoq  
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27  
28 *ACLU of Southern California v. U.S. ICE, et al.*, Case No. 2:22-CV-04760-SHK  
JOINT STATUS REPORT RE DHS CRCL SEARCH AND PRODUCTION

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16 Dated: May 24, 2025

17 Respectfully submitted,

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Pursuant to Local Rule 5-4.3.4(2)(i), the filer attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

# **EXHIBIT 3**

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14 AMERICAN CIVIL LIBERTIES  
15 UNION FOUNDATION OF  
SOUTHERN CALIFORNIA,

16 Plaintiff,

17 v.

18 UNITED STATES IMMIGRATION  
19 AND CUSTOMS ENFORCEMENT, et  
20 al.

21 Defendants.  
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No. 2:22-cv-04760-SHK

**DECLARATION OF  
CATRINA M. PAVLIK-KEENAN**

Honorable Shashi H. Kewalramani  
United States Magistrate Judge

**I. INTRODUCTION**

I, Catrina M. Pavlik-Keenan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am the Deputy Chief Freedom of Information Act (“FOIA”) Officer for the Privacy Office of the U.S. Department of Homeland Security (“DHS” or the “Department”). I have held my current position since July 4, 2021. Prior to holding this position, I was the U.S. Immigration and Customs Enforcement FOIA Officer from December 18, 2006, until July 3, 2021. Prior to holding that position, I worked for approximately four years in the FOIA office at the Transportation Security Administration (“TSA”), first as a Supervisory FOIA Analyst, then as Deputy Director for two years, and finally as Director. Prior to working at TSA, I worked for approximately nine years as a FOIA Analyst at the Department of Transportation, holding positions at the Federal Highway Administration, Office of Pipeline Safety, and Office of the Secretary from 1993 to 2002. In total, I have 30 years of experience processing FOIA requests.

2. The Privacy Office enables the Department to accomplish its mission while enforcing privacy protections in all DHS activities. DHS systems, technology, forms, and programs that collect personally identifiable information or have a privacy impact are subject to the oversight of the Chief Privacy Officer and the requirements of federal data privacy and disclosure laws.

3. DHS’s FOIA Division (“DHS-FOIA”) sits within the Department’s Privacy Office. As the Deputy Chief FOIA Officer for the Privacy Office, I act as DHS’s principal point of contact and agency representative on FOIA-related matters for DHS Headquarters (“DHS-HQ”) and all the DHS components. My official duties and responsibilities include the implementation of consistent FOIA management across DHS in collaboration with DHS components. In accordance with this responsibility, I maintain expert knowledge of the DHS FOIA regulations and routinely provide regulatory and policy guidance, technical advice, and assistance across the Department on all FOIA-related matters.

1           4.     I make this declaration to provide the Court with additional information to  
2 support the Defendant's position contained in the Joint Status Report. The statements  
3 contained in this declaration are based upon my personal knowledge, my review of the  
4 documents kept by DHS-FOIA in the ordinary course of business, and information  
5 provided to me by other DHS Headquarters ("DHS-HQ") employees in the course of my  
6 official duties.

7           **II.     Realignment of CRCL FOIA Operations to DHS HQ**

8           5.     In February of 2025, DHS Chief Privacy Officer and DHS Chief FOIA  
9 Officer Roman Jankowski issued guidance notifying DHS-HQ that in order to streamline  
10 FOIA activities, DHS-FOIA would assume responsibility for all FOIA work that was  
11 being handled by components located at DHS-HQ. DHS-FOIA would serve as the only  
12 FOIA office for DHS-HQ. Accordingly, the management and operations of the FOIA  
13 office located within the Office for Civil Rights and Civil Liberties ("CRCL-FOIA")  
14 would be transferred to DHS-FOIA by March 31, 2025. Shortly thereafter such  
15 guidance, CRCL-FOIA began to migrate its FOIA operations to DHS-FOIA.  
16 Additionally, CRCL-FOIA had two full time employees facilitate the migration process  
17 to ensure DHS-FOIA could handle the processing of CRCL-FOIA requests and  
18 accompany litigation.

19           **III.   Realignment of CRCL**

20           6.     On March 21, 2025, the majority of CRCL employees, including those  
21 working in CRCL-FOIA, were notified that they would be placed on administrative  
22 leave until their final date of employment of May 23, 2025. Due the fact that the  
23 majority of all CRCL employees were placed on administrative leave, the DHS-HQ has  
24 experienced significant challenges with completing FOIA tasks, including identifying  
25 appropriate custodians, conducting searches, identifying and retrieving responsive  
26 records, and ensuring timely productions. Accordingly, DHS has sought additional time  
27 to complete these actions. Furthermore, DHS-FOIA had not completed the HQ-FOIA  
28 realignment process before these CRCL employees had been notified of CRCL's

1 realignment, and therefore experienced additional system access and file location issues  
2 related to CRCL-FOIA's work. With respect to CRCL, the Department is beginning to  
3 staff the office consistent with plans for executing statutory functions. However, the  
4 management and operations for CRCL-FOIA will remain with DHS-FOIA.

5 **IV. CRCL's Release Activity**

6 7. CRCL-FOIA was first informed of the FOIA Request at issue in this  
7 litigation in July of 2024. CRCL-FOIA then conferred with Plaintiff about search terms.  
8 Thereafter, it conducted searches in the Case Management System ("CMS") and the  
9 DHS Headquarters Office of Chief Information Officer ("OCIO"). The CMS searches  
10 resulted in 577 records, which equaled approximately 5,649 pages. Plaintiff requested  
11 that CRCL process and produce CMS case records first, which it agreed to do. CRCL  
12 completed its processing of these records on February 21, 2025. With respect to the  
13 DHS-HQ OCIO search, consisting of searches of emails and OneDrive records, 427  
14 records equaling about 6,506 pages were first identified, after a de-duplication process  
15 occurred. At this time, due to the realignment of CRCL-FOIA, DHS-FOIA is attempting  
16 to gain access to these records to certify that the Department can still process this record  
17 set.

18 8. I understand that per the Court's December 19, 2024, Minutes of Status  
19 Conference (Dkt. 108), Plaintiff was directed to provide search terms to CRCL to further  
20 narrow the HQ OCIO search results after receiving the CMS documents. As indicated  
21 above, CRCL finished its processing and production of the CMS documents on February  
22 21, 2025. If DHS-FOIA can gain access to these HQ OCIO search results identified  
23 above, Defendant will notify the Plaintiff and request additional search terms to narrow  
24 the record set. Defendant alternatively will notify the Plaintiff if it cannot gain access to  
25 these records and will plan to re-do the search. DHS-FOIA anticipates that it can notify  
26 the Plaintiff within two weeks from the date of this filing on whether it can rely on the  
27 original HQ OCIO search or if it needs to re-do the search. Once DHS-FOIA has  
28 identified the final record set to process, it can notify the Plaintiff of the DHS-FOIA's

1 requested processing rate and attempt to negotiate if Plaintiff challenges that processing  
2 rate and processing schedule.

3 9. Under penalty of perjury, pursuant to 28 U.S.C. § 1746, I declare the  
4 foregoing is true and correct to the best of my knowledge and belief. Signed this 23rd  
5 day of May 2025.

6 **CATRINA M**  
7 **PAVLIK KEENAN** Digitally signed by CATRINA M  
PAVLIK KEENAN  
Date: 2025.05.23 16:42:26 -04'00'

8 **CATRINA M. PAVLIK-KEENAN**  
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